

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CEQUEL COMMUNICATIONS, LLC d/b/a
SUDDENLINK COMMUNICATIONS,

Plaintiff,

-against-

MOX NETWORKS, LLC,

Defendant.

Civil Action No.: 1:21-cv-05577

**JOINT PROPOSED DISCOVERY
PLAN**

Pursuant to Federal Rules of Civil Procedure 16 and 26, the parties in the above-captioned matter hereby jointly submit the following proposed discovery plan:

1. The Parties will submit motions to amend or to add parties no later than **October 15, 2021**.
2. Fact discovery must be completed by **March 15, 2022**.
3. The parties will conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the written consent of all parties without application to the Court, provided that all fact discovery is completed by the date set forth in paragraph 3 above:
 - A. Initial requests for production of documents to be served by **October 8, 2021**.
 - B. Initial interrogatories to be served by **October 8, 2021**.
 - C. Depositions to be completed by **February 18, 2022**.
 - D. Requests to admit to be served no later than **February 28, 2022**.
4. Each party anticipates taking about **5-8 depositions**.

5. Plaintiff's expert report is due on April 29, 2022.
6. Defendant's expert report is due on May 30, 2022.
7. Expert discovery to be completed by August 1, 2022.
8. The parties will discuss the possibility of settlement, and request a settlement conference with the Court if necessary, within four weeks after the parties make their initial document productions.
9. If any party wishes to make a dispositive motion, it must file a letter in accordance with this Court's Individual Practices Rule 2(B) within 60 days of completion of discovery.
10. The parties will update the Court every 60 days on the status of discovery in this matter.

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Dated: September 9, 2021

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SO ORDERED:

Honorable Naomi Reice Buchwald

Dated: _____